

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: )  
            ) CASE NO. 19 B 01500  
Jesnique Johnson, ) HON. Jacqueline P. Cox  
            ) CHAPTER 13  
DEBTOR.         )

**NOTICE OF MOTION**

TO: Tom Vaughn, Chapter 13 Trustee, 55 E. Monroe St. STE 3850, Chicago, IL 60603, via electronic court notification;  
Anna Valencia, City Clerk, 121 N. LaSalle Street, Room 107, Chicago, IL 60602;  
See attached Service List.

Please take notice that on April 27, 2020, at 9:00 a.m., I shall appear before the Honorable Judge Jacqueline P. Cox in Courtroom 680 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached motion and you may appear if you so choose.

A party who objects to this motion and wants it called must file a Notice of Objection no later than two (2) business days before the presentment date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing before the date of presentment.

**PROOF OF SERVICE**

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on April 10, 2020.

/s/ Steve Miljus  
Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
312-913-0625

City of Chicago - Parking and red Light Tick

121 N. LaSalle Street

Chicago, IL 60602-1202

City of Chicago - Parking and red Light Tick

Department of Revenue - PO Box 88292

Chicago, IL 60680

City of Chicago Department of Finance

c/o Arnold Scott Harris, P.C.

111 W. Jackson Blvd Ste. 600

Chicago, IL 60604-3517

City of Detroit Parking Violations

1001 10th St

Detroit, MI 48216-1991

City of Detroit Parking Violations

PO Box 2549

Detroit, MI 48231-2549

Credit Acceptance Corp

c/o Weber &amp; Olcese PLC

3250 W. Big Beaver Rd. Ste. 124

Troy, MI 48084-2902

Credit Acceptance Corporation

25505 W 12 Mile Road, Suite 3000

Southfield, MI 48034-8331

DEPT OF ED/NAVIENT

PO BOX 9635

WILKES BARRE, PA 18773-9635

DTE ENERGY

One Energy Plaza

Detroit, MI 48226-1221

DTE ENERGY

P.O. Box 740786

Cincinnati, OH 45274-0786

EL-GA CRE UN

2303 S CENTER RD

BURTON, MI 48519-1147

HARRIS &amp; HARRIS LTD

111 W Jackson Blvd S-400

Chicago, IL 60604-4135

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222 Merchandise Mart Plaza, Suite 1900

Chicago, IL 60654-1421

Henry Ford Medical Center

2799 W Grand Blvd

Detroit, MI 48202-2689

NPRTO Illinois, LLC

256 West Data Drive

Draper, UT 84020-2315

Navient Solutions, LLC. on behalf of

Department of Education Loan Services

PO BOX 9635

Wilkes-Barre, PA 18773-9635

(p)PROG LEASING LLC

256 WEST DATA DRIVE

DRAPEER UT 84020-2315

Progressive Leasing

256 West Data Drive

Draper, UT 84020-2315

UNIVERSITY OF MICH CR

340 E HURON ST STE 100

ANN ARBOR, MI 48104-1946

University of Michigan Credit Union

Attn.: Krystle Sheardown

340 East Huron Street

Ann Arbor, MI 48104-1909

Village of Carol Stream

Po Box 76965

Red Light Photo Enforcement Program

Cleveland, OH 44101-6500

Village of Maywood Finance Department, Parki

40 Madison St

Maywood, IL 60153-2323

Village of Maywood Finance Department, Parki

P.O. Box 22091

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Patrick S Layng

Office of the U.S. Trustee, Region 11

219 S Dearborn St

Room 873

Chicago, IL 60604-2027

Steve Miljus

The Semrad Law Firm, LLC

20 S Clark, 28th

Chicago, IL 60603

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Progressive Leasing	End of Label Matrix
10619 South Jordan Gateway #100	Mailable recipients 30
South Jordan , UT 84095	Bypassed recipients 0
	Total 30

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**MOTION TO MODIFY PLAN**

NOW COMES the Debtor, Jesnique Johnson, by and through Debtor's attorneys, The Semrad Law Firm, LLC, and moves this Honorable Court to enter an Order modifying the Chapter 13 Plan. Debtor states as follows:

1. On January 18, 2019, the Debtor filed a petition for relief pursuant to Chapter 13, Title 11 of the United States Code.
2. On March 18, 2019, this Honorable Court confirmed the Debtor's Chapter 13 Plan, with secured creditors to be paid 100.00% of their allowed claims, and general unsecured creditors are to be paid 10.00% of their allowed claims.
3. That the confirmed Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$350.00 on a monthly basis for a term of 36 months.
4. Debtor is currently not working due to the situation caused by the spread of the Coronavirus (COVID-19). As a result, Debtor is deprived of her source of income thus she cannot afford the current payment and all other expenses.
5. Debtor seeks to defer the current Plan default through April of 2020 and suspend the May, June and July 2020 Plan payments.
6. Debtor respectfully requests this Honorable Court defer the current plan default to the end of the plan of reorganization.

7. Debtor further requests this Honorable Court to suspend Chapter 13 Trustee plan payments for three months, the months of May, June and July of 2020, with regular monthly Trustee plan payments to resume in August of 2020.
8. That Debtor filed the instant case in good faith and intends to complete the Chapter 13 Plan of reorganization.

WHEREFORE, Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order modifying the Debtor's Chapter 13 Plan in order to defer the current plan default to the end of the plan of reorganization; and
- B. That this Honorable Court enter an Order suspending Debtor's Chapter 13 Trustee plan payments for three months, the months of May, June and July of 2020, with regular monthly Trustee plan payments to resume in August of 2020; and
- C. That this Honorable Court Order any further relief as the Court may deem fair and proper.

Respectfully submitted,

/s/ Steve Miljus  
Attorney for Debtor

The Semrad Law Firm, LLC  
20 S. Clark Street, 28<sup>th</sup> Floor  
Chicago, IL 60603  
(312) 913-0625